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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

CASE NO: 3:19-cv-05960-RBL

MARK HOFFMAN, on behalf of himself  
And all others similarly situated,

Plaintiff,

v.

HEARING HELP EXPRESS, INC.,  
TRIANGULAR MEDIA CORP., and  
LEWIS LURIE,

Defendants.

AFFIDAVIT OF LEWIS LURIE

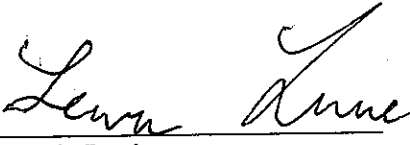
State of Florida       )  
                                  )  
County of Broward    )

I, Lewis Lurie, of Coral Springs, Florida, being of lawful age and otherwise competent and authorized to make this Affidavit, personally appeared before the undersigned notary public, and under oath or affirmation make the following statement.

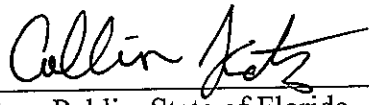
1. For more than twenty years I have resided exclusively in the State of Florida. I have never resided in the State of Washington.

- 1 2. I do not own any real estate or other property in Washington, nor have I ever owned real  
2 estate or other property in Washington.
- 3 3. I do not have an office or P.O. Box in Washington, nor have I ever had one.
- 4 4. I do not have any bank accounts in Washington, nor have I ever had one.
- 5 5. I do not pay taxes in Washington, nor have I ever.
- 6 6. I do not have any telephone listing in Washington, nor have I ever had a telephone listing  
7 in Washington or used a Washington telephone number.
- 8 7. I do not have any agents, servants, or employees in Washington, nor have I ever had any.
- 9 8. With respect to the functions I performed for Triangular Media, they were performed  
10 entirely from Florida.
- 11 9. Except for the inbound call on June 13, 2019, during which the Plaintiff, Mark Hoffman  
12 (or someone pretending to be Mark Hoffman), answered questions in Triangular's IVR  
13 path, I have no knowledge of the allegedly violative telephone calls in the complaint.
- 14 10. I do not engage in telemarketing, nor have I ever, I do not direct others to engage in  
15 telemarketing, nor have I ever.
- 16 11. I did not make the allegedly violative telephone calls, did not cause them to be made, nor  
17 did I authorize or have knowledge of any of the allegedly violative telephone calls alleged  
18 to have been made.
- 19 12. I do not own or operate an Automatic Telephone Dialing System ("ATDS"), nor have I  
20 ever owned or operated one.
- 21 13. I did not place or direct any calls to the Plaintiff, Mark Hoffman.
- 22 14. I do not know the Plaintiff, Mark Hoffman and except in the context of this lawsuit, I have  
23 never heard of Mark Hoffman.

1 Dated this 23rd Day of June 2020.

2  
3   
4 Lewis Lurie

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7 This affidavit comprised of three pages (this page included) was signed and affirmed before  
8 me on June 23<sup>rd</sup>, 2020 by Lewis Lurie, who proved to me on the basis of satisfactory  
9 evidence to be the person who appeared before me and who produced a Florida driver's license  
10 as identification.

11  
12   
13 Notary Public, State of Florida

14  
15  
16 (SEAL)

